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Sport Utility Vehicle Owners of America

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2003 OCT 30 A 10:26

October 29, 2003

National Highway Traffic Safety Administration
Public Docket Section
400 7th Street SW
Washington, DC 20590

NHTSA Docket #03-15651 - 22

Dear Sir or Madam:

On behalf of our more than 16,000 supporters, SUV Owners of America (SUVOA) appreciates the opportunity to comment on your proposed interpretations on replacement lighting systems.

We share the agency's concern for highway safety. Indeed many of the 24 million Americans who own SUVs chose them specifically with safety in mind. We would expect the agency to establish and enforce safety standards that protect the traveling public. Accordingly, we agree that aftermarket lighting should meet all applicable safety performance requirements outlined in FMVSS 108. However, we believe that the proposed interpretation would essentially add a new requirement that replacement equipment be *identical* to the original equipment it would replace. We think that this new requirement could severely inhibit or restrict the use of innovative lighting technologies and interfere with consumers' enjoyment of their vehicles because the individual could no longer customize them. In other words, we would not want to see the agency require replacement lighting equipment to be "identical" to the original lighting equipment in all aspects of design and construction.

We also agree with other comments to this docket that lighting technology and engineering have advanced so rapidly that some replacement equipment could offer safety improvements over original equipment. For example, LED technology, because of the design flexibility it offers and the added safety benefits that could be gained because LEDs come on faster and reach full brilliance much faster than a light bulb, should not be precluded simply because it is not *identical in all aspects* to original equipment.

In sum, we urge the agency to be very careful to keep all necessary performance requirements for aftermarket equipment, but to be equally careful not to be so design-restrictive as to prohibit the ability of consumers to change the appearance of their vehicle through the use of lighting equipment that is equally "safe" (or safer) but happens to be "different" than original equipment. Thank you again for the opportunity to comment on the proposed interpretations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason Vines', is written over a horizontal line.

Jason Vines, President